

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
DIVISION

KC FILED CH  
FEB 20 2008  
MICHAEL W. DOBBINS  
CLERK, U.S. DISTRICT COURT

RAMONA A. Manus

(Name of the plaintiff or plaintiffs)

v.

Sage Hospitality Resources

(Name of the defendant or defendants)

CIVIL ACTION

08CV1037

JUDGE LEFKOW

MAGISTRATE JUDGE KEYS

COMPLAINT OF EMPLOYMENT DISCRIMINATION

1. This is an action for employment discrimination.
2. The plaintiff is RAMONA A. MANUS of  
the county of CLARK in the state of NEV.
3. The defendant is Sage Hospitality Resources, who  
resides at (street address) 1512 Larimer - Suite 800 Denver, CO 80202  
(city) Denver (county) \_\_\_\_\_ (state) CO (ZIP) 80202  
(Defendant's telephone number) (303) - 595-7200

I HAD MORE Seniority with company:

AGE DISCRIMINATION: Hired Feb-2001 - VIP Services -  
After Dec-2001 - Human Resources + manager placed a  
25 yr. old in <sup>my</sup> position - Schedule Me less hours - other  
employee got Full time - Causing Me Loss of hours  
so I couldn't qualify for Health ins. payment into  
the pension - Loss of income - Finally Dismissal - July 18<sup>2006</sup>  
at that time Company Replaced ~~me~~ with same younger person  
on my job - for 2nd time -

- 4) The plaintiff sought employment or was employed by the defendant at

(street address) Sheraton Chicago Northwest

(city) Arlington Heights (county) Cook (state) Illinois (ZIP code) 60005

5. The plaintiff [check one box]

- (a) ☐ was denied employment by the defendant.  
 (b) ☐ was hired and is still employed by the defendant.  
 (c) ☒ was employed but is no longer employed by the defendant.

6. The defendant discriminated against the plaintiff on or about, or beginning on or about,

(month) Jan, (day) \_\_\_\_\_, (year) 2002.

7. (a) The plaintiff [check one box] ☐ has not filed a charge or charges against the defendant ☒ has

asserting the acts of discrimination indicated in this complaint with any of the following government agencies:

- (i) ☒ the United States Equal Employment Opportunity Commission on or about  
 (month) Mar. (day) 28 (year) 2007.  
 (ii) ☐ the Illinois Department of Human Rights on or about  
 (month) \_\_\_\_\_ (day) \_\_\_\_\_ (year) \_\_\_\_\_.

- (b) If charges were filed with an agency indicated above, a copy of the charge is

attached. ☒ YES ☐ NO

It is the policy of both the Equal Employment Opportunity Commission and the Illinois Department of Human Rights to cross-file with the other agency all charges received. The plaintiff has no reason to believe that this policy was not followed in this case.

8. (a) ☐ the United States Equal Employment Opportunity Commission has not issued a *Notice of Right to Sue*.

- (b) ☐ the United States Equal Employment Opportunity Commission has issued a *Notice of Right to Sue*, which was received by the plaintiff on (month) Nov <sup>Issued.</sup> 21 -07 2007 (day) \_\_\_\_\_ (year) \_\_\_\_\_ a copy of which *Notice* is attached to this complaint. (Received Dec. 28-07)

9. The defendant discriminated against the plaintiff because of the plaintiff's [check all that apply]

- (a) ☒ Age (Age Discrimination Employment Act).
- (b) ☐ Color (Title VII of the Civil Rights Act of 1964 and 42 U.S.C. §1981).
- (c) ☐ Disability (Americans with Disabilities Act)
- (d) ☒ National Origin (Title VII of the Civil Rights Act of 1964 and 42 U.S.C. §1981).
- (e) ☐ Race (Title VII of the Civil Rights Act of 1964 and 42 U.S.C. §1981).
- (f) ☐ Religion (Title VII of the Civil Rights Act of 1964)
- (g) ☐ Sex (Title VII of the Civil Rights Act of 1964)

10. The plaintiff is suing the defendant, a state or local government agency, for discrimination on the basis of race, color, or national origin (42 U.S.C. §1983).

☒ YES      ☐ NO

11. Jurisdiction over the statutory violation alleged is conferred as follows: over Title VII claims by 28 U.S.C. §1331, 28 U.S.C. §1343(a)(3), and 42 U.S.C. §2000e-5(f)(3); over 42 U.S.C. §1981 and §1983 by 42 U.S.C. §1988; over the A.D.E.A. by 42 U.S.C. §12117.

12. The defendant [check all that apply]

- (a) ☐ failed to hire the plaintiff.
- (b) ☐ terminated the plaintiff's employment.
- (c) ☐ failed to promote the plaintiff.
- (d) ☐ failed to reasonably accommodate the plaintiff's religion.
- (e) ☐ failed to reasonably accommodate the plaintiff's disabilities.
- (f) ☐ other (specify): \_\_\_\_\_

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13. The facts supporting the plaintiff's claim of discrimination are as follows:

I was Hired Feb 2001 - Full time - Human Resources hired a 20? yrs. PERSON LATER giving her all hours due Me - Continuing over 1yr. Retaliation against Me - No Scheduled hours Causing Loss of INCOME - Pension my health insurance & health issues caused by their deliberate actions Retaliation of my efforts to cease practices & my Filed grievances AND hiring an attorney to collect workmens compensation for an injury occurring at work Human Resources didn't collect - After I was fired they recalled SAME PERSON FOR MY Job 1 (2nd time)

14. [AGE DISCRIMINATION ONLY] Defendant knowingly, intentionally, and willfully discriminated against the plaintiff.

15. The plaintiff demands that the case be tried by a jury.



YES



NO

16. THEREFORE, the plaintiff asks that the court grant the following relief to the plaintiff [check all that apply]

- (a) ☐ Direct the defendant to hire the plaintiff.
- (b) ☐ Direct the defendant to re-employ the plaintiff.
- (c) ☐ Direct the defendant to promote the plaintiff.
- (d) ☐ Find that the defendant failed to reasonably accommodate the plaintiff's religion.
- (e) ☐ Find that the defendant failed to reasonably accommodate the plaintiff's disabilities.
- (f) ☐ Direct the defendant to (specify): \_\_\_\_\_

Judgment



- (g) If available, grant the plaintiff appropriate injunctive relief, lost wages, liquidated/double damages, front pay, compensatory damages, punitive damages, prejudgment interest, post-judgment interest, and costs, including reasonable attorney fees and expert witness fees.